

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division**

LEE G. FRANKLIN,

Plaintiff,

v.

Civil Action No. 4:11-cv-139 AWA/FBS

EXPERIAN INFORMATION SOLUTIONS,
INC.,

TRANS UNION, LLC,

BANK OF AMERICA, NATIONAL
ASSOCIATION,

ARROW FINANCIAL SERVICES, LLC,

AMERICAN EXPRESS,

Defendants.

**DEFENDANT ARROW FINANCIAL SERVICES, LLC'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE A RESPONSE TO COMPLAINT**

Defendant Arrow Financial Services, LLC ("Arrow Financial"), by counsel, pursuant to Rule 7 of the Local Rules of this Court, respectfully moves the Court for entry of an Agreed Order for an extension of time until January 25, 2012, to file a response to the Complaint filed in this case. The grounds for this Motion are set forth in a Memorandum in Support filed in conjunction with this Motion.

January 17, 2012

Respectfully submitted,

ARROW FINANCIAL SERVICES, LLC.

By: /s/ Bryan A. Fratkin
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CERTIFICATE OF SERVICE

I hereby certify that on January 17, 2012, a true copy of the foregoing was filed using the Court's CM/ECF system, which will send electronic notice of such filing to:

<p>Leonard A. Bennett Susan Mary Rotkis Consumer Litigation Associates, P.C. 12515 Warwick Boulevard, Suite 100 Newport News, VA 23606 (757) 930-3660 Fax: (757) 930-3662 lenbennett@clalegal.com srotkis@clalegal.com <i>Counsel for Plaintiff</i></p>	<p>David Neal Anthony Troutman Sanders LLP Troutman Sanders Bldg 1001 Haxall Point PO Box 1122 Richmond, VA 23219 804-697-5410 Fax: 804-698-5118 david.anthony@troutmansanders.com <i>Counsel for Experian Information Solutions, Inc.</i></p>
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/s/

Bryan A. Fratkin